

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff

v.

- 1) Genesis GV80, VIN:
KMUHCECOMU057308 with PR
license plate number JRF001.
- 2) \$980.00 in United States currency.
- 3) 2003 Ford F-350, VIN:
1FDWF37FX3EA19386, with PR
license plate number H72313.
- 4) \$491,243.93 in United States currency.
- 5) \$325,673.58 in United States currency.
- 6) \$34,010.00 in United States currency.
- 7) \$933.00 in United States currency.

Defendants *in Rem*.

CIVIL NO. 24-

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

TYO THE HONORABLE COURT:

COMES Now, the United States of America brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil

Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought pursuant to 18 U.S.C. §§ 371 and 2314 - Conspiracy to Transport Stolen Property Interstate and Violation of 18 U.S.C. § 1956(h) - Money Laundering Conspiracy and is therefore subject to seizure and forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 18 U.S.C. §§ 981 (a)(1)(a) and (a)(1)(C), as well as 18 U.S.C. §§ 371, 1956(h), and 2314.
3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

THE DEFENDANTS *IN REM*

1. The Defendants *in Rem* are:

- 1). Genesis GV80, VIN: KMUHCECOMU057308 with PR license plate number JRF001 seized on March 20, 2024, from registered owner Jaime A. Pérez-Hernández.
 - 2). \$980,00 in United States currency, seized on March 20, 2024, from inside a Toyota Corolla located at Voladores Road., 111 KM 9.3, Moca, Puerto Rico.
 - 3). 2003 Ford F-350, VIN:1FDWF37FX3EA19386, with PR license plate number H72313 seized on March 20, 2024, in Moca, Puerto Rico.
 - 4). \$491,243.93 in United States currency, seized on March 20, 2024, pursuant to a seizure warrant executed on a bank account in Banco Popular de Puerto Rico.
 - 5). \$325,673.58 in United States currency, seized on March 20, 2024, pursuant to a seizure warrant executed on a bank account in Banco Popular de Puerto Rico.
 - 6). \$34,010.00 in United States currency, seized on March 20, 2024, from residence at Cerro Gordo, Road 495, KM 0.9, Moca Puerto Rico
 - 7). \$933.00 in United States currency, seized on March 20, 2024, on a business located at Voladores Road., 111 KM 9.3, Moca, Puerto Rico.
2. The Defendants *in Rem* are within the possession, custody, or control of the United States.

FACTS

3. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Kasim M. Bernabe-Urrutia of the Federal Bureau of Investigation.

CLAIM FOR RELIEF

The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *in Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *in Rem* condemned and forfeited to the United States of America for disposition according to law and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this day of 2024.

W. STEPHEN MULDROW
United States Attorney

/s/ Frank Norris
Frank Norris
Special Assistant United States Attorney
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DECLARATION

I, Frank Norris, Special Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the United States Federal Bureau of Investigation (“FBI”); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this day of 2024.

/s/ Frank Norris

Frank Norris

Special Assistant United States Attorney

VERIFICATION

I, Kasim M. Bernabe-Urrutia, depose and say that I am a Special Agent with the Federal Bureau of Investigation and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this day of 2024.

KASIM BERNABE-URRUTIA Digitally signed by KASIM BERNABE-URRUTIA
Date: 2024.09.11 15:59:50 -04'00'

Kasim M. Bernabe-Urrutia, Special Agent
Federal Bureau of Investigation (FBI)